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WT Docket No. 97-112

CC Docket No. 90-6

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May 30, 2000

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SUMMARY

GTE Service Corporation and Texas RSA 20 B2 Limited Partnership urge the Commission to promote the provision of satisfactory and ubiquitous cellular service by amending its cellular service regulations as they apply to carriers operating adjacent to or in the Gulf of Mexico. The record in this proceeding makes it painfully obvious that cellular service in the Gulf of Mexico is far from optimal. As GTE and other commenters have explained, the provision of cellular service in the Gulf presents unique difficulties of providing reliable service to transitory oil rigs as well as to customers along an irregularly-shaped coastline, leading to divergent and conflicting interests among water-based and land-based carriers. The ultimate result of these conflicts has been the deterioration of cellular service along the coastline. Contrary to the comments of Bachow/Coastel, L.L.C., conflicts between water-based and land-based licensees have escalated and show no indication of being “resolved” or even mitigated, so long as the current cellular rules continue to apply to cellular licensees operating in or adjacent to the Gulf.

In their current form, the Commission’s cellular rules hamper and actually prevent the provision of reliable cellular service in the coastal areas of the Gulf of Mexico, compromising public safety as well as convenience. As illustrated by the record in this proceeding and by these supplemental reply comments, the current regulations increase the likelihood that cellular customers will roam on another carrier’s network, even when a call is placed within their own licensed service area. Inadequate cellular service and roaming is disruptive for callers who experience dropped calls or

pay high roaming fees. It is also a public safety hazard for callers who are placing emergency calls and require E911 services and speedy assistance.

The record indicates that a significant consensus has formed around the adoption of ALLTEL's alternative solution to licensing conflicts in the Gulf of Mexico. GTE and Texas RSA 20 B2 Limited Partnership urge the Commission to adopt ALLTEL's solution as the most effective means of resolving cellular conflicts and of ensuring the provision of reliable cellular service in coastal areas. The creation of a "Coastal Zone," where both water-based and land-based licensees can operate, will permit licensees to provide satisfactory cellular service to transient oil rigs, as well as to consumers along the shoreline. The Commission has full authority to implement ALLTEL's solution; indeed, it would be reasonable to say that the Commission has a responsibility and obligation to do so. The FCC traditionally has demonstrated firm commitment to the provision of ubiquitous cellular service and to the implementation of E911. As the record in this proceeding shows, continued commitment to these goals mandates the revision of the Commission's current licensing regulations as they apply to the cellular carriers operating in or adjacent to the Gulf of Mexico.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Cellular Services and Other Commercial)	WT Docket No. 97-112
Mobile Radio Services in the Gulf of)	
Mexico)	
)	
Amendment of Part 22 of the Commission's)	CC Docket No. 90-6
Rules To Provide for Filing and Processing)	
of Applications for Unserved Areas in the)	
Cellular Service and To Modify Other)	
Cellular Rules)	

**SUPPLEMENTAL REPLY COMMENTS OF GTE SERVICE CORPORATION
AND TEXAS RSA 20 B2 LIMITED PARTNERSHIP**

GTE Service Corporation, on behalf of its telephone and wireless subsidiaries ("GTE"), and Texas RSA 20 B2 Limited Partnership ("TX 20") (together, "Commenters") hereby respectfully submit these reply comments in response to the Commission's Second Further Notice of Proposed Rule Making in the above-captioned proceeding ("Second FNPRM").¹ As GTE explained in its Supplemental Comments, the Second

¹ In the Matter of Cellular Service and Other Commercial Mobile Radio Services in the Gulf of Mexico, WT Docket No. 97-112; Amendment of Part 22 of the Commission's Rules to Provide for Filing and Processing of Application for Unserved Areas in the Cellular Service and to Modify Other Cellular Rules, CC Docket No. 90-6, *Second Further Notice of Proposed Rule Making*, FCC 97-110 (rel. Apr. 16, 1997) ("Second FNPRM"). See Public Notice, "Federal Register Publication of the Second Further Notice of Proposed Rulemaking Regarding the Licensing of Cellular Service and Other Commercial Mobile Radio Services in the Gulf of Mexico," DA 00-687 (March 27, 2000) (noting failure to publish Second FNPRM in the *Federal Register* and reopening the pleading cycle).

FNPRM provides a much-needed opportunity for the Commission to adapt outdated and ill-fitting standardized cellular rules to the unique needs of cellular licensees in the Gulf of Mexico.² The record in this proceeding underscores the need for Commission review of current cellular licensing rules as they apply to licensees in the Gulf of Mexico. There is an overwhelming consensus among land-based cellular licensees that the current regulations affirmatively prevent the provision of reliable cellular service to the public along the shoreline. The weight of the record stands in stark contrast to the isolated claim of Bachow/Coastel, L.L.C. ("Bachow") that the current rules are satisfactory.³ The Commenters herein provide additional, concrete evidence that the current rules are contrary to the public interest, from both a general customer satisfaction standpoint as well as from a public safety standpoint. GTE reaffirms its support of and TX 20 endorses ALLTEL Corporation's compromise solution as the best method for providing reliable cellular service in the Gulf.

² See Supplemental Comments of GTE Service Corporation (filed May 15, 2000) ("GTE Supplemental Comments") (All comments were filed in WT Docket No. 97-112 unless otherwise noted).

³ See Comments of Bachow/Coastel, L.L.C. (filed May 15, 2000) ("Bachow Comments").

I. BACHOW'S INSISTENCE THAT CURRENT REGULATIONS ARE ACCEPTABLE IS CONTRARY TO FACTUAL EVIDENCE AND THE WEIGHT OF THE RECORD IN THIS PROCEEDING.

A. Cellular Service Along the Gulf of Mexico Shoreline Is Unreliable

Bachow's bald assertion that "cellular service is . . . entirely reliable in the coastal areas of the Gulf"⁴ glosses over the needs and problems of land-based licensees and references only the service capabilities of the two water-based licensees.⁵ Bachow's conclusion that there is no need to modify the Commission's cellular regulations, as applicable to carriers operating in and adjacent to the Gulf, is contrary to the weight of the record in this proceeding. Rather, the record indicates that the current rules do not permit land-based licensees to provide reliable cellular service along the Gulf of Mexico shoreline. As ALLTEL Corporation stated, "the continuing inability of ALLTEL and other carriers to provide ubiquitous service to land-based customers in coastal areas has reached crisis levels."⁶ Even the Wireless Telecommunications Bureau recognized this fact with respect to certain Florida markets, stating that, "at present, cellular coverage is either unreliable or not available along the coast and on numerous barrier islands"⁷ The unreliability of cellular service along the coastline is a direct outgrowth of current Commission regulations.

⁴ Bachow Comments at 6.

⁵ *Id.*

⁶ Further Comments of ALLTEL Corporation at 7 (filed May 15, 2000) ("ALLTEL Comments").

⁷ Public Notice, "Wireless Telecommunications Bureau Grants Special Temporary Authority to ALLTEL Corporation Allowing Improvements in Cellular Coverage in
(Continued...)

As GTE and other commenters have explained, land-based licensees cannot comply with current Commission rules, which forbid even a *de minimis* contour extension into the market of the adjacent co-channel licensee without its consent, and still generate adequate signal strength at the market boundary to provide reliable service. BellSouth Corporation (“BellSouth”) observed that, “[u]nder the current rules, BellSouth has experienced difficulty serving beaches, highways, and communities along the shoreline because it is effectively precluded from extending reliable service contours into the Gulf.”⁸ Echoing these grievances, SBC Wireless Inc. (“SBC”) stated that it “has struggled with the difficulties associated with attempting to engineer a cellular system that provides reliable service on the coast, especially the heavily trafficked beach and recreation areas, and the inherent problem of land-based customers calls being captured by the Gulf carriers.”⁹

Coastal Florida,” DA 99-2073 (rel. Oct. 4, 1999).

⁸ Further Comments of BellSouth Corporation at 1 (filed May 15, 2000) (“BellSouth Comments”).

⁹ Supplemental Comments of SBC Wireless Inc. at 1 (filed May 15, 2000) (“SBC Comments”).

In order to comply with Commission rules, land-based licensees must operate at the market border at lower signal strengths than are acceptable, with the end result being that they are oftentimes not the ‘best server’ within their own protected CGSA. The effects are two-fold: first, calls set up on water-based licensees’ systems, resulting in expensive roaming charges for land-based subscribers;¹⁰ and second, pockets of land along the coastline must go unserved. The Commission should not place cellular carriers in the untenable position where compliance with FCC regulations guarantees that they cannot provide satisfactory service to subscribers within their authorized service area.

B. Current Regulations Are Not “Working” and Cooperation Among Water-Based and Land-based Carriers Is Notably Absent.

As an additional matter, Bachow’s claim that cellular service is “reliable” disingenuously blacks out numerous instances—indeed, instances where Bachow itself has been a dissenting party—where land-based licensees have entreated the Commission for special assistance in order to provide adequate cellular service to subscribers within their authorized service areas. Bachow claims that the current rules are an “undeniable success,” and that “[l]and-based carriers are availing themselves of mechanisms under the current regulatory scheme such as Special Temporary Authority and de minimis extensions to serve any temporarily unserved areas, as well as coastal

¹⁰ *Id.* at 3 (“The consumer does not expect the call to be set up on a Gulf carrier thus incurring roaming charges or for there to be no coverage.”).

areas off the west coast of Florida.”¹¹ What Bachow fails to mention, however, is that it has ardently opposed use of these regulatory mechanisms. For example, when the Wireless Telecommunications Bureau granted ALLTEL’s request for an extension of its Special Temporary Authority to operate cellular sites in numerous Florida coastal markets,¹² Bachow filed a vociferous petition for reconsideration.¹³ For its own part, GTE has not been able to negotiate a reasonable agreement with Bachow to extend *de minimis* contours into coastal waters.¹⁴ The time for negotiating and for accusations has long since passed, as the public has been kept waiting too long for reliable cellular service.

In sum, contrary to Bachow’s claim that the current rules are satisfactory, the record should lead the Commission to the following series of interrelated conclusions. First, the current Commission rule requiring attenuation of signal strength at the market

¹¹ Bachow Comments at 11-12.

¹² FCC Form 601, File Nos. 0000095454, 0000095459 and 0000095460 (filed March 17, 2000) (“STA Extension Request”).

¹³ In the Matter of Application of ALLTEL Corporation, Call Sign WPOK991, File No. 0000095460, Reply Reference 2000C1-MAF, Petition for Reconsideration filed by Bachow/Coastel L.L.C. (May 1, 2000). The fact that ALLTEL must resort to requesting Special Temporary Authority in order to provide adequate service to land-based subscribers within its authorized service area provides evidence that current cellular licensing rules are *not* satisfactory. Special temporary authority is a regulatory mechanism that typically is reserved only for extraordinary circumstances. In other words, special temporary authority should not be required simply to provide reliable cellular service on a day-to-day basis to subscribers within a licensee’s CGSA.

¹⁴ GTE’s inability to negotiate reasonable terms with Bachow undercuts Bachow’s statement that “the current rules . . . have produced cooperation among carriers.” Bachow Comments at 8.

boundary results in land-based licensees' inability to provide reliable cellular service along the shoreline. Second, because of this inability to provide reliable cellular service, land-based subscribers are subject to capture along the coastline by water-based licensees. Finally, because of this subscriber capture, unwitting members of the public are forced to pay substantially more expensive roaming rates.

C. The Current Regulations Produce Conflict and Uncertainty Among Cellular Licensees in the Gulf

GTE disagrees with Bachow's claim that the Enforcement Bureau's decision in *Bachow/Coastel, L.L.C. v. GTE Wireless of the South, Inc.*,¹⁵ has "provided the basis for certainty and order" regarding service of coastal areas in the Gulf. First, this Order, issued by the Enforcement Bureau, failed to resolve the issue of the location of the boundary line demarcating the Mobile, Alabama MSA. Indeed, the boundary dividing the Mobile, Alabama MSA from the GMSA remains in question. GTE has submitted an Application for Review of the Enforcement Bureau's Order that remains pending.¹⁶

Second, Bachow's argument utterly ignores land-based carriers' problems with providing reliable cellular service on land, as described above and in GTE's

¹⁵ *Bachow/Coastel, L.L.C., Complainant v. GTE Wireless of the South, Inc., Defendant*, File No. WB/ENF-F-98-005, *Order*, DA 00-420 (Chief, Enforcement Bureau, rel. Feb. 29, 2000) ("*Order*").

¹⁶ See *Bachow/Coastel, L.L.C., Complainant v. GTE Wireless of the South, Inc., Defendant*, File No. WB/ENF-F-98-005, *Order*, DA 00-420 (Chief, Enforcement Bureau, rel. Feb. 29, 2000) ("*Enforcement Bureau Order*"); *Bachow/Coastel, L.L.C., Complainant, v. GTE Wireless of the South, Inc., Defendant*, File No. WB/ENF-F-98-005, Application for Review (filed Mar. 16, 2000).

supplemental comments in this docket.¹⁷ Indeed, the Order has spawned a seemingly endless string of pleadings by Bachow designed to diminish GTE's ability to serve its customers and improve the likelihood that land-based traffic will roam onto Bachow's system.

Third, Bachow's claim ignores the public interest. GTE has documented the tidal wave of customer complaints GTE has received in the Mobile MSA as a result of the Commission's decision to strictly enforce its rules at the coastline. Subscribers who were once loyal GTE customers now are faced with diminished or non-existent service, causing many to cancel their subscriptions and seek service from CMRS providers that are not restricted from providing a strong signal in beachfront areas. Thus, Bachow's claim that the Enforcement Bureau's Order has established "certainty and order" could not be further from the truth.

II. NEW FACTUAL EVIDENCE PROVIDES FURTHER BASIS FOR DETERMINING THAT THE CURRENT RULES DO NOT SERVE THE PUBLIC INTEREST.

Since filing its supplemental comments in this proceeding, GTE has obtained additional evidence that the current regulations do not serve the public interest in the Gulf of Mexico. First, GTE has confirmed that subscribers in Texas are facing high roaming rates as a result of capture by the Bachow system even when the subscriber is seeking to use his or her phone within the GTE service area. This data illustrates the immense dissatisfaction subscribers experience due to high roaming rates charged by

¹⁷ See GTE Supplemental Comments.

the water-based carriers. Second, results from a test on land on Galveston Island, within GTE's authorized service area in the Galveston, Texas MSA, indicate that E911 calls set up on Bachow's system and are routed to the Coast Guard, rather than to a land-based Public Safety Answer Point ("PSAP"). These test results demonstrate that the public safety is compromised by the current cellular regulations.

A. Subscriber Cancellations Provide Tangible Evidence of Customer Dissatisfaction With Current Cellular Service.

In its supplemental comments, GTE noted that, as a result of the Commission's current rules and the problems with providing reliable levels of service to the public near the coastline, many land-based subscribers are "captured" by the co-channel Gulf licensee.¹⁸ Subsequent to the submission of those comments, GTE confirmed that subscribers in its Texas markets, where Bachow has installed cell sites as close to the market boundaries as possible, face these problems on a regular basis.

For example, one former customer resident in Vidor, Texas complained upon receiving a bill with \$744.00 in roamer charges—all attributable to Bachow.¹⁹ A review of the bill indicates a certain randomness as to when the former customer roamed on Bachow's system and when he was able to obtain service on the GTE system authorized to serve his area and to which he had subscribed. The bill also confirms the excessive level of fees charged by Bachow—\$3.00 per day and \$3.00 per minute, plus

¹⁸ GTE Supplemental Comments at 4-5.

¹⁹ A copy of this bill, with customer identifying information omitted at the former customer's request, is attached as Exhibit A.

toll charges.²⁰ Despite efforts to address this former customer's concerns about the roaming charges, he canceled service with GTE. One can understand that decision after reviewing the attached bill. His experience highlights the problems faced by cellular subscribers seeking to utilize land-based cellular service in areas adjacent to the Gulf.

B. Land-Based Carriers Must Be the “Best Server” Within Their Service Areas in Order Most Effectively To Protect Public Safety.

On May 23, 2000, GTE performance staff conducted test 911 calls from a cellular phone on Galveston Island, located within GTE's authorized CGSA for the Galveston, Texas MSA.²¹ Rather than setting up on GTE's own system, the calls set up on Bachow's water-based system, demonstrating that current regulations do not permit GTE to be the best server within its own authorized service area. More importantly, however, Bachow routed these land-based emergency calls to the Coast Guard, acting as the Public Safety Answer Point (“PSAP”) for water-based calls. As described below, land-based emergency calls that are routed to the Coast Guard compromise public safety. While the inability of GTE and TX 20 to provide reliable service to land-based customers on a regular basis may impair customer satisfaction, their inability to pick up 911 calls from land-based customers may impair customer health and welfare. This is an unacceptable result of the current Commission regulations.

²⁰ See, e.g., Exhibit A at 4-6.

²¹ See Declaration of Rathel Alexander, attached as Exhibit B. Please note that the Declaration contains a facsimile signature. The original Declaration will be filed with the Commission.

The routing of 911 land-based calls to a water-based carrier's network increases the likelihood that a response will be delayed, thus imposing unnecessary risks upon the land-based subscriber. When a land-based call is routed to the Coast Guard, there is a much greater likelihood that the deployment of emergency assistance will be delayed while the call is re-routed to the appropriate land-based PSAP for handling (for example, to the fire or police station). Even worse, GTE and TX 20 are concerned that the Coast Guard may lack the information and capability to route misdirected 911 calls to the appropriate PSAP.

Delivering 911 calls from land to land-based PSAP is essential for land-based calls. First, for obvious reasons, a land-based PSAP is in a much better position to render aid and assistance to a land-based customer than is the United States Coast Guard.

Second, land-based PSAPs are much more likely to have deployed enhanced 911 ("E911") services. The enhancements for 911 calls are taking place in two phases.²² In Phase I, the phone number and base site location are relayed to the PSAP for a wireless 911 call, which assists the PSAP in calling the consumer back if the call is dropped. Additionally, this information provides some assistance in locating the emergency caller. In Phase II, which is scheduled for implementation next year, the PSAP will be able to locate the caller, within approximately 100 meters. To the best of the Commenters' knowledge, Gulf-based carriers have not clearly indicated the manner in which they will comply with these requirements. Subscribers who are aware of E911

²² See 47 CFR § 20.18(d), (e).

developments may therefore intentionally sign up with land-based carriers, in order to ensure routing of their 911 calls to a PSAP on land. The Commission has indicated its strong commitment to the implementation of E911; GTE hopes that the Commission's interest in ensuring access to E911 will extend to its consideration of cellular licensing rules in the Gulf of Mexico.

III. THE RECORD IN THIS PROCEEDING CONFIRMS THE NEED FOR ADOPTION OF ALLTEL'S ALTERNATIVE SOLUTION TO CELLULAR LICENSING ISSUES IN THE GULF OF MEXICO

The record before the Commission overwhelmingly demonstrates an urgent need for immediate Commission action resolving the multifarious problems plaguing cellular carriers in the Gulf of Mexico. As GTE stated in its initial comments, the best way for the Commission to resolve these issues is to adopt ALLTEL's alternative solution.

ALLTEL's proposal is the most effective way of improving the quality of cellular service in the Gulf. As described in detail in ALLTEL's comments, ALLTEL proposes that the Commission establish a Coastal Zone where both land-based and water-based carriers may extend cellular contours, subject to mandatory frequency coordination but without interference protection.²³ ALLTEL's proposal addresses the needs of both water-based and land-based carriers: water-based carriers may retain the flexibility to relocate their cell sites freely, while land-based carriers will be assured of providing satisfactory cellular service to their subscribers along the shoreline. As BellSouth

²³ See ALLTEL Comments at 9-10.

affirms, "adoption of ALLTEL's proposal would resolve many of the problems presently facing cellular carriers in the Gulf Area, especially service disputes between the land-based and Gulf-based carriers and the assurance of reliable and ubiquitous service to their respective customers."²⁴

Bachow claims that the Commission does not have authority to establish a "Coastal Zone" without undertaking a formal hearing process under Section 316 of the Communications Act.²⁵ GTE disagrees. Section 316 is inapplicable in the context of a general rule making proceeding. As the Commission has stated:

Section 316 provides for a hearing process before Commission modification of a particular license. The provision does not deprive the Commission of its authority to establish rules of general applicability to an industry through its rulemaking authority. It is well established that licenses may be modified in a rulemaking proceeding as long as a reasoned explanation is provided for doing so.²⁶

Section 316 is applicable to a situation where an individual licensee's license is modified; it is not applicable to a situation such as this one, where the Commission is addressing cellular problems that plague cellular carriers generally in the Gulf of

²⁴ BellSouth Comments at 2.

²⁵ Bachow Comments at 24-26.

²⁶ Amendment of Part 22 of the Commission's Rules to Provide For Filing and Processing of Applications for Unserved Areas in the Cellular Service and to Modify Other Cellular Rules, 14 FCC Rcd 10030, ¶ 123 (1999).

Mexico.²⁷ The Commission is acting well within its authority in modifying certain licenses subject to a rulemaking proceeding.²⁸

Finally, as ALLTEL demonstrated in its comments, the Commission has full authority to implement ALLTEL's proposal.²⁹ Sections 303(f) and 303(r) of the Communications Act provide the Commission with ample authority to redress problems of radiofrequency interference that have confronted cellular carriers in the Gulf of Mexico.³⁰ Indeed, the public interest mandates that the Commission take action to redress this situation.

IV. CONCLUSION

As the weight of the record in this rulemaking proceeding has demonstrated, there is an urgent need for Commission review of its cellular licensing rules as they apply to Gulf carriers. The Second FNPRM provides the Commission with the opportunity finally to redress the conflicts and problems faced by water-based and land-based carriers. As confirmed by other commenters, cellular service along the shoreline

²⁷ See *California Citizens Band v. United States*, 375 F.2d 43, 52 (9th Cir. 1967) (stating that the purpose of Section 316 "is to protect the individual licensee from a modification order of the Commission and is concerned with the conduct and facts peculiar to an individual licensee").

²⁸ See Revision of Rules and Policies for the Direct Broadcast Satellite Service, *Report and Order*, 11 FCC Rcd 9712, 9766 (1995) (stating that "the Commission may modify any station license or construction permit if in its judgment such action will promote the public interest, convenience, and necessity, and, . . . such modification may appropriately be accomplished through Notice, and comment rulemaking").

²⁹ ALLTEL Comments at 17-19.

³⁰ 47 U.S.C. § 303(f), 303(r); see ALLTEL Comments at 17.

is unreliable, creating customer dissatisfaction and compromising public safety.

Contrary to Bachow's claim that the current rules are satisfactory, the Commenters have documented examples of subscriber capture, exorbitant roaming charges, and a general inability to provide adequate cellular service to subscribers within its licensed CGSA—all outgrowths of the current cellular regulations. The Commenters are hopeful that the Commission will adopt ALLTEL's solution to licensing issues in the Gulf of Mexico, thereby promoting the provision of reliable and seamless cellular coverage to the public in the Gulf of Mexico.

Respectfully submitted,

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May 30, 2000

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EXHIBIT A:
Copy of Customer Bill

GTE WIRELESS
GTE Wireless Customer Care
P.O. Box 105372
Atlanta GA 30348
800/347-5665

YOU MAY NOTICE A FEW CHANGES ON THIS BILL

GTE is constantly working to make our bills easier to understand. So you may notice a few changes, beginning with this month's statement.

CHANGES TO CALL DETAIL

Subtotals were added to each column to make it easier for you to compare that with the charges outlined in the "Detail of Airtime Usage" section. We've also included a \$0.00 charge for minutes used that are part of your packaged minutes so that local airtime used will be accurately reflected.

BILLING EXPLANATION INCLUDED ON BACK OF PAGE 1

The back of page 1 now has updated information that will answer many of your frequently asked questions. This section is there every month for you if you have questions.

NETWORK IMPROVEMENTS

If you live in Beaumont, now is your time to call to get a digital phone. Very shortly, all of Beaumont will be digital. Be sure to call and upgrade to digital service to receive all of the digital benefits. These benefits include: First Incoming Minute Free, Increased Call Privacy, and Better Call Quality. Also, ask about Web Messaging, which includes alerts on the weather, stocks, sports, and more! Call today at 1-800-671-6711!

RETURN THIS PORTION WITH PAYMENT

BILL DATE	MAY 02, 2000
INVOICE #	08522716-0500
Total amount due	\$1195.16
Send check payable to	

GTE WIRELESS
P.O. BOX 630023
Dallas TX 75263-0023

916105 0702 0000119516 0000065326 30008522716 000131 0000000000002

ACCOUNT
SUMMARYBILL DATE MAY 02, 2000
INVOICE # 08522716-0500

PREVIOUS BALANCE

PAYMENT RECEIVED - 04/04/00 - Thank you
Payments received after 05/02/00 will
appear on the next statement.653.26
131.94CR

PREVIOUS ADJUSTMENTS - See detail below

218.07CR

BALANCE FORWARD - DUE IMMEDIATELY

303.25

Current Charges:

MONTHLY SERVICE

65.00

ROAMER CHARGES

787.94

OTHER CHARGES & CREDITS

2.95

(See details of OTHER CHARGES AND CREDITS)

TAXES, SURCHARGES, AND FEES:

FEDERAL EXCISE TAX 25.80

STATE SALES TAX 4.49

CITY SALES TAX 1.08

STATE 911/911 FEE 0.50

TX INFRASTRUCTURE REIMB. FEE 0.89

STATE UNIVERSAL SERVICE FUND 2.74

FEDERAL UNIVERSAL SVCS FEE 0.52

TOTAL TAXES, SURCHARGES, AND FEES 36.02

TOTAL CURRENT CHARGES DUE BY MAY 28, 2000 891.91

TOTAL AMOUNT DUE 1195.16

PREVIOUS ADJUSTMENT DETAIL:

ROAMING CR-FINAL-APRIL

4/11

218.07CR

Detail of PHONE CHARGES

Detail of monthly service

Arrears	04/03/00 to 05/02/00	65.00	
Total			65.00

Detail of custom calling features

CALLER ID	04/03/00 to 05/02/00	0.00	
Total			0.00

Detail of other charges & credits

MR. RESCUE PROCESSING FEE		2.95	
Total			2.95

Detail of airtime usage

Rate plan : FASNN	AMER - 325 MIN-A	Included Minutes :	325
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Period	Included	Used	Rate	Charge
Rate Plan Included Minutes	325.00	94.00		
Peak		50.00	0.000	0.00
Off-Peak		44.00	0.000	0.00
Voice Plan Incl. Minutes		7.00	0.000	0.00
Total	325.00	101.00		0.00

TOTAL	325.00	101.00		0.00
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Detail of airtime and long distance charges

Date	Time	City	ST	Number	Per	Min.	Air	Toll	Total
3/21	1045A	VIDOR	*R TX	409/769-4738	P	1.00	0.00		0.00
3/21	1058A	BEAUMONT	*R TX	409/781-4019	P	2.00	0.00		0.00
3/21	155P	VIDOR	*R TX	409/769-4738	P	10.00	0.00		0.00
3/28	828A	RECORDING		409/673-7359	P	1.00	0.00		0.00
3/28	1128A	BEAUMONT	TX	409/781-4019	P	1.00	0.00		0.00
3/28	1219P	BEAUMONT	TX	409/781-4019	P	1.00	0.00		0.00
3/28	1249P	*INCOMING*		409/673-7359	P	2.00	0.00		0.00*
3/28	1253P	*INCOMING*		409/673-7359	P	0.00	0.00		0.00*
3/28	157P	HOUSTON	TX	713/254-9954	P	2.00	0.00		0.00
3/28	345P	*INCOMING*		409/673-7359	P	3.00	0.00		0.00*
3/28	350P	BEAUMONT	TX	409/781-4019	P	1.00	0.00		0.00
3/28	401P	RECORDING		409/673-7359	P	1.00	0.00		0.00
3/28	402P	BEAUMONT	TX	409/781-4019	P	1.00	0.00		0.00
3/28	718P	*INCOMING*		409/673-7359	P	0.00	0.00		0.00*

Phone Detail

4
Bill Date MAY 02, 2000

Date	Time	City	ST	Number	Per	Min.	Air	Toll	Total
3/30	138P	EVADALE	TX	409/276-1963	P	1.00	0.00		0.00
3/30	910P	VIDOR	TX	409/769-4731	OP	9.00	0.00		0.00
3/30	921P	EVADALE	TX	409/276-1963	OP	2.00	0.00		0.00
3/31	1109A	VIDOR	TX	409/769-6034	P	1.00	0.00		0.00
3/31	703P	VIDOR	TX	409/769-4738	P	1.00	0.00		0.00
4/01	1044A	CHIEFLAND	FL	352/493-4110	OP	24.00	0.00		0.00
4/02	1246P	*INCOMING*		409/673-7359	OP	1.00	0.00		0.00*
4/02	228P	RECORDING		409/673-7359	OP	1.00	0.00		0.00
4/03	1153A	SKOKIE	IL	847/647-8200	P	10.00	0.00		0.00
4/03	111P	BEAUMONT	TX	409/781-4019	P	2.00	0.00		0.00
4/03	246P	ALPHARETTA	GA	770/772-0926	P	1.00	0.00		0.00
4/03	315P	SANANTONIO	TX	210/824-4444	P	2.00	0.00		0.00
4/03	329P	HAMPTON	VA	757/721-0480	P	1.00	0.00		0.00
4/03	416P	HOUSTON	TX	713/781-9200	P	3.00	0.00		0.00
4/03	702P	*INCOMING*		409/673-7359	P	0.00	0.00		0.00*
4/04	235A	VIDOR	TX	409/769-4738	OP	1.00	0.00		0.00
4/04	236A	VIDOR	TX	409/769-4738	OP	1.00	0.00		0.00
4/04	826A	VIDOR	*R TX	409/769-4738	P	1.00	0.00		0.00
4/09	821P	RECORDING		409/673-7359	OP	1.00	0.00		0.00
4/11	110P	RECORDING		409/673-7359	P	1.00	0.00		0.00
4/21	421P	RECORDING		409/673-7359	P	1.00	0.00		0.00
4/21	607P	NEWORLEANS	LA	409/673-7359	P	4.00	0.00		0.00L
4/21	833P	LAFAYETTE	LA	409/673-7359	P	4.00	0.00		0.00L
4/21	1037P	VIDOR	TX	409/769-4738	OP	1.00	0.00		0.00
4/22	1111A	EVADALE	TX	409/276-1963	OP	1.00	0.00		0.00
4/22	1127A	VIDOR	TX	409/769-2288	OP	2.00	0.00		0.00
4/22	407P	RECORDING		409/673-7359	OP	1.00	0.00		0.00
4/22	823P	VIDOR	TX	409/769-4738	OP	2.00	0.00		0.00
4/25	402P	VIDOR	TX	409/769-4738	P	1.00	0.00		0.00
4/25	405P	VIDOR	TX	409/769-4738	P	1.00	0.00		0.00
4/25	413P	VIDOR	TX	409/769-4738	P	1.00	0.00		0.00
Total						101.00	0.00	0.00	0.00

* 1 minute deducted from call duration

P = Peak, OP = Off-peak, E = Extended, W = Weekend, PM = Peak Multi

*R = Home Roaming

Detail of roamer charges

Calls placed on COASTAL COMMUNICATIONS GULF OF MEXICO WIRELINE								SID 00194		
Date	Time	City	St	Number	Per	Min.	Air	Toll	Tax	Total
3/15	340P	VIDOR	TX	409/769-4738	P	20.0	60.00	5.20	0.00	65.20
3/17	642A	VIDOR	TX	409/769-4738	OP	14.0	42.00	2.24	0.00	44.24
3/17	1127A	VIDOR	TX	409/769-4738	P	2.0	6.00	0.52	0.00	6.52
3/17	1130A	800 SERV	CL	800/347-5665	P	7.0	21.00	0.00	0.00	21.00
3/17	1137A	VIDOR	TX	409/769-4738	P	2.0	6.00	0.52	0.00	6.52

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3/17	447P VIDOR	TX	409/769-4738 P	10.0	30.00	2.60	0.00	32.60
3/17	457P 800 SERV	CL	800/347-5665 P	12.0	36.00	0.00	0.00	36.00
3/18	708A VIDOR	TX	409/769-4738 OP	10.0	30.00	1.15	0.00	31.15
3/20	705A VIDOR	TX	409/769-4738 P	10.0	30.00	2.60	0.00	32.60
3/20	452P VIDOR	TX	409/769-4738 P	4.0	12.00	1.04	0.00	13.04
4/04	847P VIDOR	TX	409/769-4738 OP	4.0	12.00	0.70	0.00	12.70
4/07	827P VIDOR	TX	409/769-4738 OP	1.0	3.00	0.17	0.00	3.17
4/07	829P VIDOR	TX	409/769-4738 OP	1.0	3.00	0.17	0.00	3.17
4/07	830P BEAUMONT	TX	409/781-4019 OP	1.0	3.00	0.17	0.00	3.17
4/07	831P VIDOR	TX	409/769-4738 OP	14.0	42.00	2.43	0.00	44.43
4/09	159P VIDOR	TX	409/769-4738 OP	3.0	9.00	0.37	0.00	9.37
4/09	410P BEAUMONT	TX	409/781-4019 OP	2.0	6.00	0.25	0.00	6.25
4/09	648P VIDOR	TX	409/769-4738 OP	1.0	3.00	0.12	0.00	3.12
4/09	812P VIDOR	TX	409/769-4738 OP	2.0	6.00	0.25	0.00	6.25
4/09	842P VIDOR	TX	409/769-4738 OP	14.0	42.00	1.75	0.00	43.75
4/10	629P VIDOR	TX	409/769-4738 P	24.0	72.00	6.78	0.00	78.78
4/11	1235P BROUSSARD	LA	318/837-8500 P	1.0	3.00	0.17	0.00	3.17
4/11	100P BROUSSARD	LA	318/837-8500 P	2.0	6.00	0.34	0.00	6.34
4/11	103P BEAUMONT	TX	409/338-7871 P	1.0	3.00	0.28	0.00	3.28
4/11	104P BEAUMONT	TX	409/338-7371 P	3.0	9.00	0.85	0.00	9.85
4/12	649A VIDOR	TX	409/769-4738 OP	16.0	48.00	3.32	0.00	51.32
4/12	1118P VIDOR	TX	409/769-4738 OP	4.0	12.00	0.70	0.00	12.70
4/13	314P BROUSSARD	LA	318/837-8540 P	1.0	3.00	0.17	0.00	3.17
4/13	315P BROUSSARD	LA	318/837-8500 P	2.0	6.00	0.34	0.00	6.34
4/13	317P VIDOR	TX	409/769-4738 P	13.0	39.00	3.67	0.00	42.67
4/13	330P BROUSSARD	LA	318/837-8500 P	1.0	3.00	0.17	0.00	3.17
4/14	418P BROUSSARD	LA	318/837-8500 P	1.0	3.00	0.17	0.00	3.17
4/14	419P BROUSSARD	LA	318/837-8500 P	1.0	3.00	0.17	0.00	3.17
4/15	449P VIDOR	TX	409/769-4738 OP	16.0	48.00	2.00	0.00	50.00
4/16	700A VIDOR	TX	409/769-4738 OP	4.0	12.00	0.50	0.00	12.50
4/16	746A BEAUMONT	TX	409/784-7853 OP	2.0	6.00	0.25	0.00	6.25
4/16	747A BEAUMONT	TX	409/784-7853 OP	1.0	3.00	0.12	0.00	3.12
4/17	440P VIDOR	TX	409/769-4738 P	6.0	18.00	1.69	0.00	19.69
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				233.0	699.00	43.94	0.00	742.94

Detail of roamer surcharges

Date	Surcharge Type	Charge Amt.	Tax	Total
3/15	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
3/17	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
3/18	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
3/20	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/04	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/07	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/09	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/10	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/11	Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00

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4/12 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/13 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/14 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/15 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/16 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
4/17 Roamer Access Chg - COASTAL COMMUNICATION	3.00	0.00	3.00
Total surcharge	45.00	0.00	45.00

EXHIBIT B:
Declaration of Rathel Alexander

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Cellular Services and Other Commercial)	WT Docket No. 97-112
Mobile Radio Services in the Gulf of)	
Mexico)	
)	
Amendment of Part 22 of the Commission's)	CC Docket No. 90-6
Rules To Provide for Filing and Processing)	
of Applications for Unserved Areas in the)	
Cellular Service and To Modify Other)	
Cellular Rules)	

DECLARATION OF RATHEL ALEXANDER

I, Rathel Alexander, declare the following:

1. I am a performance engineer for GTE Wireless Incorporated ("GTE"). My responsibilities include the day to day performance engineering for GTE's Texas area. These duties include the optimization of the Houston market (which has been integrated with the Galveston, Texas system), integration of new cell sites and resolution of customer trouble complaints. As part of my responsibilities, I am familiar with the issues facing cellular carriers operating adjacent to the Gulf of Mexico.
2. On May 23, 2000, I placed several test 911 calls using a cellular phone within GTE's authorized cellular geographic service area ("CGSA"). Specifically, the calls were placed at 82nd Street and Seawall Boulevard¹ in Galveston, Texas, in the

¹ Seawall Boulevard is also known as FM 3005.

Galveston, Texas MSA. The calls were placed with a CDMA cell phone set to analog mode. Three calls were placed at this location, and all three emergency calls set up on the cellular system of Bachow/Coastel, L.L.C. and were routed to the Coast Guard.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May, 30, 2000.



Rathel Alexander